

IN THE UNITED STATES BANKRUPTCY COURT
FOR THE WESTERN DISTRICT OF PENNSYLVANIA

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|-------------------------|---|-----------------------------|
| IN RE: |) | |
| |) | |
| Trisa M. Thompson, |) | Bankruptcy No. 18-20958-TPA |
| |) | Chapter 7 |
| Debtor |) | |
| |) | |
| Eric E. Bononi, Trustee |) | |
| |) | |
| Movant |) | |
| |) | |
| Trisa M. Thompson, |) | |
| |) | |
| Respondent |) | |

RESPONSE TO OBJECTION TO DEBTOR'S EXEMPTIONS

AND NOW, comes the debtor, Trisa M. Thompson, by and through her attorney, Lauren M. Lamb, Esquire and Steidl & Steinberg, P.C., and respectfully represents as follows:

1. Admitted.
2. Admitted.
3. Admitted.
4. Admitted.
5. Admitted.
6. Admitted.
7. Admitted.
8. Admitted.
9. Admitted with clarification. The exact value of the points assigned to Debtor's claim and the exact amount of the medical liens will not be known until sometime

- in 2022. However, it is possible for Debtor to receive a preliminary distribution of settlement proceeds based on estimates of these amounts at this time.
10. Denied. Special Counsel believes that a distribution of Debtor's exemptions under both 11 U.S.C. §§522(d)(5) and 522(d)(11)(D) is possible at this time.
11. Admitted with clarification. Debtor's property valuation of \$95,000.00 was based on the 2014 purchase price.
12. Denied. The current value of Debtor's property is immaterial. Debtor believes that her exemptions should be based upon the value of her property as of the date the petition was filed. Based on comparable sales at that time, Debtor believes that the property was worth much less than the Trustee's valuations and she is in the process of obtaining her own valuation.
13. Denied.
14. Admitted.

WHEREFORE, the debtor, Trisa M. Thompson, respectfully requests this Honorable Court deny the Trustee's Objection to Debtor's Exemptions.

Date: November 22, 2021

/s/ Lauren M. Lamb
Lauren M. Lamb, Esquire
Attorney for the Debtor
STEIDL & STEINBERG
Suite 2830 – Gulf Tower
707 Grant Street
Pittsburgh, PA 15219
(412) 391-8000
llamb@steidl-steinberg.com
PA I.D. No. 209201